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12 EMC CORPORATION

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA  
15 WESTERN DIVISION

16 AUTHENEX, INC., a Delaware  
17 corporation,

18 Plaintiff,

19 v.

20 EMC CORPORATION, a Massachusetts  
21 corporation; VASCO DATA  
22 SECURITY INTERNATIONAL, INC.,  
a Delaware corporation; and VASCO  
23 DATA SECURITY, INC., a Delaware  
corporation.

24 Defendants.  
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Case No.: CV10-1251 MRP (VBKx)

**DEFENDANT EMC  
CORPORATION'S NOTICE OF  
MOTION AND MOTION FOR  
SUMMARY JUDGMENT OF  
NON-INFRINGEMENT OF U.S.  
PATENT NO. 7,519,989**

Hearing Date: January 24, 2011  
Time: 11:00 a.m.  
Courtroom: 12

Honorable Mariana R. Pfaelzer

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on January 24, 2011 at 11:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 12 of the Honorable Mariana R. Pfaelzer, located at 312 North Spring Street, Los Angeles, California, Defendant EMC Corporation ("EMC") will, and hereby does, respectfully move, pursuant to Federal Rule of Civil Procedure 56 and Civil Local Rules 7 and 56, for summary judgment in favor of EMC and against Plaintiff Authenex, Inc. ("Authenex") on all of Authenex's claims, declaring that EMC's RSA SecurID 800 ("SecurID 800") does not infringe claims 1, 2, 3 and 24 of Authenex's U.S. Patent No. 7,519,989 (the "'989 patent"). Summary judgment is appropriate because the SecurID 800 does not include structurally separate and distinct display and body portions that are fixedly attached to one another and does not display a group of characters consisting of both letters and numbers. Accordingly, the accused SecurID 800 does not practice the "body portion," "display portion," "the display portion is fixedly attached to the body portion" or "a display for displaying alphanumeric characters" limitations of claims 1, 2, 3 and 24 of the '989 patent.

This motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on October 14, 2010.

This motion is based on the notice of motion, the accompanying Memorandum of Points and Authorities, the Statement of Uncontroverted Facts and Conclusions of Law, the supporting declaration and evidence attached thereto, the Notice of Lodging and RSA SecurID 800 lodged with the Court, and any other evidence the Court deems proper and just.

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1 Dated: December 6, 2010

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